



**FINDING OF NO SIGNIFICANT IMPACT/DECISION NOTICE  
CLIMBING MANAGEMENT PLAN  
ENVIRONMENTAL ASSESSMENT  
NEW RIVER GORGE NATIONAL RIVER  
FAYETTE COUNTY, WEST VIRGINIA**

Rock climbing has become one of the most popular recreational activities at New River Gorge National River since the park's establishment in 1978. The sandstone escarpment along the western rim of the gorge provides very high quality climbing rocks, attracting increasing numbers of climbers of all levels of experience. The New River Gorge is now one of the largest climbing centers in the eastern United States.

The increased use of New River Gorge climbing areas has meant increased impacts to natural resources such as soils, plants, and animals. The proximity of several threatened, endangered, and sensitive species or their habitat to the climbing area is a particular consideration in managing climbing activities. At the same time, visitor enjoyment and safe use of the park are also considerations. Increased popularity of the area has sometimes meant that there have been conflicts among users with different needs and interests, such as commercial use groups, nonprofit groups, and individual climbers. A Climbing Management Plan/Environmental Assessment (EA) was prepared to assess resource impacts, increasing visitor use, and user conflicts associated with rock climbing in New River Gorge National River. A specific goal of the plan is to build partnerships with climbers, both individuals and groups, in order to better manage climbing activities and protect resources at the national river.

#### **SELECTED ALTERNATIVE**

The National Park Service has selected Alternative B, the preferred alternative, which is described on pages 25- 29 of the EA. Alternative B provides a balance between recreational use and resource protection. Climbing activities would be managed to a greater degree than at present to ensure that resources would be protected and that climbers would continue to have opportunities for a high quality experience. A variety of approaches and tools would be used, including education and outreach efforts, improvements to facilities, and the use of new and existing trails. An enhanced program of inventory and monitoring for threatened, endangered, and sensitive species would be undertaken; if indicated, access routes or climbing routes could be closed off to protect these species and their habitat.

#### **ALTERNATIVES CONSIDERED**

In addition to the Selected Alternative, described above, two other alternatives were analyzed in the EA. Alternative A, the No Action Alternative, would continue present management operations and conditions unchanged. Alternative A is described in detail on pages 23- 25 of the EA. Alternative C would be similar to Alternative B. It would be slightly more restrictive in that concession contracts would be required for commercial use, and there would be a more restrictive preemptive closure for potential peregrine falcon nesting at Endless Wall. Alternative C is described in detail on pages 29- 31 of the EA.

## ENVIRONMENTALLY PREFERRED ALTERNATIVE

The Selected Alternative, as described on pages 25- 29 of the EA, is also the environmentally preferred alternative. The environmentally preferred alternative is the alternative that will promote the national environmental policy as expressed by §101 of the National Environmental Policy Act. This includes alternatives that:

- (1) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- (2) assure for all generations safe, healthful, productive, and esthetically and culturally pleasing surroundings;
- (3) attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
- (4) preserve important historic, cultural and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
- (5) achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities; and
- (6) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources. (National Environmental Policy Act, Section 101).

Simply put, this means the alternative that causes the least damage to the biological and physical environmental; it also means the alternative which best protects, preserves, and enhances historic, cultural and natural resources.

Overall, the Selected Alternative will result in long- term beneficial effects on visitor use and experience, national river operations, and natural resources. Both Alternatives B and C would provide greater natural resource protection than the No Action Alternative. Alternative C would provide slightly more protection to one resource, the peregrine falcon. However, it would result in adverse economic impacts to some commercial climbing services by restricting the services allowed to operate in the park by business permit holders.

Through education, outreach, and the development of partnerships with climbing groups, Alternative B (the Selected Alternative) enlists the cooperation and involvement of climbers in preserving and protecting park resources. Park staff anticipates that, over the long term, this strategy will be more effective than Alternative C, which requires more stringent regulation of climbers and more monitoring and enforcement by park staff. By using climbing organizations to assist in developing, promoting and enforcing standards that promote resource protection and safe climbing, the NPS can direct funds and personnel to additional resource protection efforts.

## MITIGATION MEASURES

The EA described a number of mitigation measures that will be incorporated into the selected alternative. The mitigation measures will be applied to soils (pages 62- 63 of the EA), vegetation (pages 62- 63 of the EA), wildlife and species of special concern (pages 62- 63 of the EA), cultural resources (pages 63- 65 of the EA), visitor use and experience (pages 65- 66 of the EA), and

commercial use (page 66 of the EA). These mitigation measures are also summarized in the table provided as Attachment A.

## **WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT**

As defined in 40 CFR §1508.27, significance is determined by examining the following criteria:

*Impacts that have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts that require analysis in an EIS*

As analyzed in the EA, there will be minor long- term beneficial impacts to soils, wildlife and vegetation, cultural resources and threatened and endangered species due to increased monitoring, climber education, and better designation of trails. To encourage peregrine falcon nesting along the Endless Wall area, reduced use of this area would be encouraged by national river staff during late- winter/early- spring. Impacts to peregrine falcons could be beneficial, long- term and minor, if this induced any of the species to nest in the area. If falcons were found to have nested in this area, it would be closed off until the young fledged or nesting was determined to have failed, again, with beneficial impacts.

Safety will be enhanced for climbers by requiring accreditation of climbing services. Visitor experience and park resources will benefit from increased education and outreach to climbers, and by encouraging their input into climbing management decisions. To encourage peregrine falcon nesting along the Endless Wall area, reduced use of this area will be encouraged by national river staff during late- winter/early- spring.

There will be a negligible short- term adverse economic effect on climbing guides and organizations requiring certification or accreditation under the Selected Alternative.

*The degree to which public health and safety are affected*

Increased climber education, opportunities for climber participation in management decisions, and accreditation of climbing services will provide minor to moderate long- term public health and safety benefits.

*Any unique characteristics of the area ( proximity to historic or cultural resources, wild and scenic rivers, ecologically critical areas, wetlands or floodplains, park lands, prime farmlands)*

Cultural resources, including structures that are on the National Register of Historic Places, cultural landscapes, and pre- historic archeological sites have been identified in the national river. Past uses as well as natural processes have impacted some cultural resources. Currently identified as well as undiscovered cultural resources in the project area will be beneficially affected by better management and monitoring of climbing activities. Following review of the Climbing Management Plan, the West Virginia Division of Culture & History concurred that “Alternative B is the most favorable alternative in regards to protection of historic landscapes and structures within the New River Gorge National River” and that “Alternative B provides the most supervision of climbers, regulating group size, and designating climbing areas and walking trails which will limit the impact

visitors may have to existing historic structures and landscapes.” The correspondence further stated that “this office is of the opinion that implementation of Alternative B will have No Adverse Effect to any architectural or landscape resources listed in or eligible for inclusion in the National Register of Historic Places” and that “no further consultation is necessary with this office regarding this project.” (see Attachment B - - correspondence from West Virginia Division of Culture & History.

*The degree to which impacts are likely to be highly controversial*

Because of the popularity of the park as a climbing destination, many park visitors have an interest in decisions that have the potential to affect the climbing experience. Not every visitor can be expected to agree with all provisions of the climbing management plan. However, the climbing management plan seeks to foster greater cooperation among climbers and NPS. It will involve climbers in decisions that will affect the climbing experience as well as educate them about the importance of “leave no trace” recreation and protection of park resources. These actions should provide an overall enhancement to the climbing experience for most climbers. Therefore, effects on the quality of the human environment are not expected to be highly controversial.

*The degree to which the potential impacts are highly uncertain or involve unique or unknown risks*

Human safety is always an issue in an inherently risky activity like climbing. The risks, however, are for the most part not unique or unknown. The climbing management plan seeks to reduce risks by a variety of means such as requiring accreditation of climbing guide services. The plan also will collect data on climbers and seek their input on decisions that could impact visitor safety. The climbing management plan therefore will enhance visitor safety. Possible effects on other aspects of the human environment are not highly uncertain, nor do they involve unique or unknown risks.

*Whether the action may establish a precedent for future actions with significant effects or represent a decision in principle about a future consideration*

The Selected Alternative does not establish a precedent for future actions with significant effects or represent a decision in principle about a future consideration. Monitoring of park resources and visitor experience is an important part of the Climbing Management Plan. Management actions and the plan itself can be revised to accommodate new information. New data will guide the development of the General Management Plan which is due to be revised in the next few years. The Climbing Management Plan, in turn, will be revised as needed to conform with the management decisions reflected in the General Management Plan.

*Whether the action is related to other actions that may have individual insignificant impacts but cumulatively significant effects*

A variety of past, present and reasonably foreseeable future actions have affected resources at and in the vicinity of New River Gorge. The selected alternative will have some effects on natural resources, archeological resources, historic structures, cultural landscapes, and visitor experiences. As analyzed in the EA, any adverse impacts are expected to be minor to moderate. For the most part, the impacts of the selected alternative are expected to be beneficial and will,

thus, have a moderating effect on any past, present, or future actions that might negatively impact these resources.

*The degree to which the action may adversely affect districts, sites, highways, structures, or objects in or eligible for listing in the National Register of Historic Places, other significant scientific, archeological, or cultural resources*

The Selected Alternative would not adversely affect any historic structures or significant scientific, cultural, or historical resources. The West Virginia Division of Culture & History concurs with the park that Alternative B is the preferred alternative (see Attachment B). This alternative, by designating climbing areas and regulating group size, would have a minor, beneficial, long- term effect on such resources as described on pages 63- 65 of the EA. NPS would continue to inventory and evaluate historic properties, cultural resources, and cultural landscapes, and develop management strategies to protect these resources, including climbing route closures and other restrictions, if needed. The park consulted with the West Virginia Division of Culture & History on this plan and received their concurrence (see Attachment B). As requested by the West Virginia Division of Culture & History, if an increase in rock climbing results in any alterations to the area, including additional trails or new construction, they will be consulted and given an opportunity to review any such projects and comment upon specific activities undertaken in fulfillment of the Climbing Management Plan.

*The degree to which the action may adversely affect an endangered or threatened species or its critical habitat*

Several federally listed species and other rare species or their habitat are found in or near the vicinity of the gorge; some are found in or near the climbing area. The presence or possible presence of these species requires special consideration by NPS managers at New River Gorge.

The federally endangered Virginia big- eared bat has been documented roosting in mines within a few hundred feet of the climbing area. A single male Indiana bat, also a federally endangered species, was found in the gorge approximately seven miles south of the climbing area. It is possible that a federally listed plant, the small- whorled pogonia, may be found in the gorge, although it has not so far been discovered there. The U.S. Fish and Wildlife Service (FWS) has stated that climbing activities are not likely to affect either of the federally listed bat species (see Attachment C).

Several other species of concern are found in or adjacent to the climbing area. (Species of concern are state listed, or species for which FWS has concerns but lacks sufficient information to propose federal listing.) These species include the small- footed bat, Rafinesque's big- eared bat, Allegheny woodrat, green salamander, Swainson's warbler, cerulean warbler, and spring coralroot. An additional species of concern that may be found in the area, although it has not been documented, is the Allegheny cliff fern. The U.S. Fish and Wildlife Service has stated that, while it is unlikely that climbing activities would adversely affect the two federally listed bat species, the small- footed bat and Rafinesque's big- eared bat could be subject to disturbance due to their habit of roosting in cracks in the cliff face.

A final species, the delisted peregrine falcon, has been the object of special attention from the park since the late 1980's, when efforts were undertaken to re-introduce the species to the gorge area.

Although units of the NPS are legally required to address federally-listed threatened and endangered species but not state-listed species, it is NPS policy to support preservation of all species of concern and their habitats. New River Gorge is addressing concerns about rare species in and near the climbing area by an enhanced program of monitoring and inventorying for these species, in particular rare bat species. The park is prepared to require closures of trails and access routes if it appears that climbing activities in the gorge or access to climbing routes is impacting any species of concern or its habitat. Education of climbers regarding the importance of species of concern and their possible presence in the park will also be carried out. If an increase in rock climbing results in any alterations to the area, including additional trails or new construction, the U. S. Fish & Wildlife Service will be consulted and given an opportunity to review any such projects and comment upon specific activities undertaken in fulfillment of the Climbing Management Plan. For these reasons, no adverse impacts to species of special concern are expected under the Selected Alternative.

*Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment*

This action violates no federal, state, or local environmental protection laws.

## **IMPAIRMENT OF PARK RESOURCES OR VALUES**

The National Park Service Organic Act of 1916, and related laws, mandate that the units of the national park system must be managed in a way that leaves them "unimpaired for the enjoyment of future generations". These laws give the NPS the management discretion to allow certain impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, so long as the impact does not constitute impairment of the affected resources and values. Director's Order 12 states that environmental documents will evaluate and describe impacts that may constitute an impairment of park resources or values. In addition, the decision document will summarize impacts and whether or not such impacts may constitute an impairment of park resources or values. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park,
- (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- (3) identified as a specific goal in the park's general management plan or other relevant NPS planning documents.

In addition to reviewing the list of significance criteria, the National Park Service has determined that implementation of the proposal will not constitute an impairment to New River Gorge National River's resources and values. This conclusion is based on a thorough analysis of the environmental impacts described in the *Climbing Management Plan EA*, the public comments received, relevant scientific studies, and the professional judgment of the decision-maker

guided by the direction in *NPS Management Policies* (2001). Almost all impacts of the plan are beneficial; any possible adverse impacts are negligible and short-term, and are the result of actions taken to preserve and restore other park resources and values. Overall, the plan results in benefits to park resources and values, opportunities for their enjoyment, and it does not result in their impairment.

## **PUBLIC INVOLVEMENT**

In October of 2000, the park formally began the planning process for management of climbing activities in the park by conducting a publicly announced scoping session in the city of Fayetteville, West Virginia. An additional scoping session was held in April of 2001 at the park's Canyon Rim Visitor Center. For both scoping sessions, press releases were distributed, newspaper articles were published, direct mailings were made to approximately 91 agencies, organizations and individuals, and a broadcast fax was made to local outfitters. Several interest groups, including the Access Fund and the New River Alliance of Climbers, further disseminated the information via the internet and e-mail list.

In May of 2003 when the park had formulated a draft plan with alternatives, another public meeting was held. Again press releases were issued, news articles published, direct mailings and fax broadcasts were made. In addition, the park developed and distributed a brochure that summarized the alternatives. The draft plan was posted on the park's website. Hard copies of the plan were printed and mailed to interested individuals, organizations and cooperating federal and state agencies. In addition, copies of the draft plan were available at visitor centers and headquarters, as well as distributed to local business where visitors frequent. A special email address for commenting on the plan was set up and made available to the public. The comment period ended June 30, 2003 with 17 comments received at park headquarters and at the special email address.

The park responded to public comments in a table included in the Final Climbing Management Plan, which was submitted for public review again in April 2005. The second public comment period ended on April 30, 2005, with four comments received. Two of the comments received expressed concern with regards to the AMGA certification requirement, one comment expressed concern with the group size limitation in the Junkyard climbing area, and one comment was very favorable in support of the selected alternative (Alternative B). Comments received did not result in any changes to the EA.

## **CONCLUSION**

The selected alternative does not constitute an action that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment. Negative environmental impacts that could occur are minor or moderate in intensity. There are no significant impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared.

Recommended:

Calvin F. Hite

Superintendent

8-18-05

Date

Approved:

Mary H. Bomer

Northeast Regional Director

9-7-05

Date



## ATTACHMENT A

### Mitigation Measures for Selected Alternative

Impact Topics	Mitigation Measures for Selected Alternative
Soils	<p>Conduct soil compaction survey of climbing areas to determine extent of soil impacts. Establish monitoring plots above and below the rim to gauge long- term effects of soil compaction and erosion. Improve climbing access trails to reduce soil impacts associated with braided and informal trails. Install top anchors to reduce soil compaction.</p> <p>Under new management strategies, impacts to soils would be beneficial, minor and long term.</p>
Vegetation	<p>Survey for small- whorled pogonia, Allegheny cliff fern, and spring coralroot. Conduct inventory and monitoring for bryophytes, lichen, and invertebrates. Monitor rim vegetation communities. Better designate trails. Under new management strategies, impacts to vegetation would be beneficial, minor and long term.</p>
Wildlife and Species of Special Concern – including Peregrine Falcons	<p>Continue existing inventory and monitoring and enhance monitoring of rare bat species. Conduct inventory and monitoring for green salamander, cerulean warbler, and Swainson’s warbler. Increase monitoring and documentation of peregrine falcons in the New River Gorge during nesting season. Close cliff areas, with appropriate buffer, only after peregrine courtship behavior is observed. Improve education and outreach for compliance with the park's monitoring plan for peregrine falcons. Initiate voluntary compliance with monitoring efforts of Endless Wall during peregrine falcon nesting season and encourage use of alternative climbing areas. If an increase in rock climbing results in any alterations to the area, including additional trails or new construction, the West Virginia Division of Culture &amp; History will be consulted and given an opportunity to review any such projects and comment on any specific activities undertaken in fulfillment of the Climbing Management Plan.</p> <p>With increased monitoring, hiker education, and route closures if needed, there would be minor, beneficial, long-term impacts to species of special concern. With reduced use of the Endless Wall and increased monitoring during the late- winter/early- spring, the impacts to peregrine falcons would be beneficial, long- term and minor.</p>
Cultural Resources	<p>Archeological surveys have been conducted within New River Gorge National River boundaries resulting in the identification of numerous archaeological sites, some of which may be eligible for inclusion in the National Register of Historic Places and some of which may be located within rock overhangs or other settings in areas designated for climbing. Under Alternative B, the NPS will continue to inventory, evaluate and protect all archaeological resources within its jurisdiction and educate climbers and other recreational users about archeological resource values. Threats to archaeological resources will be identified and management strategies for those resources will be developed. If an increase in rock climbing results in any alterations to the area, including additional trails or new construction, the West Virginia Division of Culture &amp; History will be consulted and given an opportunity to review any such projects and comment on any specific activities undertaken in fulfillment of the Climbing Management Plan.</p> <p>A 1996 special historic study for the New River Gorge identified five historic contexts incorporating most of the national river’s historic properties, with historic contexts from the coal, railroad, and lumber industries; Euro-American settlement/agriculture; and recreation/state parks. Under Alternative B, the NPS will continue to inventory, evaluate and protect all historic landscapes and architectural resources within its jurisdiction and educate climbers and other recreational users about historic landscape and architectural resource values. Threats to historic landscape and architectural resources will be identified and management strategies for those resources will be developed. Alternative B will provide the most supervision of climbers, regulate group size, and designate climbing areas and walking trails which will limit the impact visitors may have to existing historic structures and landscapes. Chalk free areas will be designated as deemed necessary to protect cultural and natural resources. If an increase in rock climbing results in any alterations to the area, including additional trails or new construction, the West Virginia Division of Culture &amp; History will be consulted and given an opportunity to review any such projects and comment on any specific activities undertaken in fulfillment of the Climbing Management Plan.</p> <p>By following these management strategies, there would be minor, long- term beneficial impacts for archeological, historical and cultural resources.</p>

Impact Topics	Mitigation Measures for Selected Alternative
<b>Visitor Use and Experience</b>	<p>Implement community outreach efforts geared toward the climbing community (both commercial and non-commercial) and involve recreational users to evaluate existing trails for improvements, maintenance or closure with goal of developing climbing access trail network. Develop onsite educational opportunities including trailhead and visitor center signs and displays promoting leave- no- trace ethic and safe climbing. Encourage leave- no trace ethic that promotes minimal chalk use. Monitor chalk use and identify problem areas as they arise. Conduct semi-annual public meetings to gather recommendations for bolt replacement and potential new anchor routes. After Superintendent approval, allow use of motorized drills for replacing and adding new anchors. Encourage top anchors on high- use routes. Improve access trails and better designate climbing areas. Prohibit leaving slings and quick draws on routes. Develop climbing specific educational literature for distribution at visitor centers, mailed, or posted on the national river's Web page. Designate other climbing areas for small groups (ten or less) to ensure more intimate climbing experience and require special use permits (organized noncommercial use) for climbing groups ten or larger at all climbing areas. Designate Bridge Buttress and other suitable sites (pending acquisition) for group use.</p> <p>Both climbing and non- climbing visitor would benefit in a minor, long- term way.</p>
<b>Commercial Use</b>	<p>Continue Incidental Use Permit (IBP) requirement. Require accreditation of commercial guide services or certification of individual guides (includes guide training in leave- no- trace ethic). Conduct annual commercial IBP meeting/workshop of owners, operators, and managers. Collect additional information on group use including use areas, climber numbers, days, and time.</p> <p>Required accreditation or certification of IBP holders would result in beneficial, minor, long- term impacts. There may be some adverse, negligible short- term impacts as a result of the cost of accreditation for each permittee.</p>

## **ATTACHMENT B**



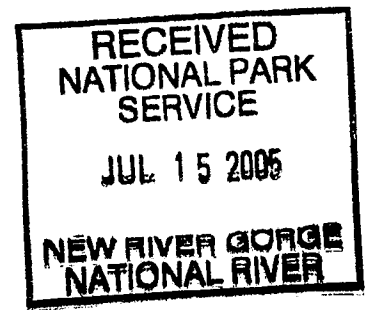
WEST VIRGINIA  
DIVISION OF  
CULTURE & HISTORY

1900 Kanawha Blvd., E.  
Charleston, WV  
25305-0300

Phone 304.558.0220  
Fax 304.558.2779  
TDD 304.558.3562  
www.wvculture.org  
EEO/AA Employer

July 8, 2005

Mr. Clavin Hite  
Superintendent  
US DOI  
104 Main Street  
P.O. Box 246  
Glen Jean, WV 25846



RE: Climbing Management Plan and Environmental Assessment  
FR#: 03-682-FA-1

Dear Mr. Hite:

We have reviewed the report titled, *Climbing Management Plan Environmental Assessment*, that was submitted for the above referenced project. As required by Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties," we submit our comments.

Architectural Resources:

The West Virginia State Historic Preservation Office has reviewed the proposed alternatives for "responding to the increasing visitor use, resource impacts, and user conflicts associated with rock climbing the areas within the boundaries of New River Gorge National River that are owned by the National Park Service" in Fayette County. There are multiple resources located within the New River Gorge National River area that are considered by this office to be eligible for inclusion in the National Register of Historic Places. Following review of the materials submitted, this office concurs that Alternative B is the most favorable alternative in regards to protection of historic landscapes and structures within the New River Gorge National River. Alternative B provides the most supervision of climbers, regulating group size, and designating climbing areas and walking trails which will limit the impact visitors may have to existing historic structures and landscapes. Therefore, this office is of the opinion that implementation of Alternative B will have No Adverse Effect to any architectural or landscape resources listed in or eligible for inclusion in the National Register of Historic Places. No further consultation is necessary with this office regarding this project. However, if the increase in rock climbing results in any alterations to the area, including additional trails or new construction, this office would appreciate the opportunity to review any such project.

Archaeological Resources:

The management plan indicates that a number of archaeological surveys have

Mr. Clavin Hite  
FR# 03-682-FA-1  
July 8, 2005  
Page 2

been conducted within New River Gorge National River boundaries resulting in the identification of numerous archaeological sites, some of which may be eligible for inclusion in the National Register of Historic Places. The management plan also states that National Register eligible sites may be located within rock overhangs or other settings in areas designated for climbing and that these sites could be discovered and disturbed during climbing activities. Alternative B, which is preferred, indicates that the National Park Service will continue to inventory, evaluate and protect all archaeological resources within its jurisdiction and educate climbers and other recreational users about "cultural resource values." It also indicates that threats to archaeological resources will be identified and that management strategies for those resources will be developed. We concur with the general provisions provided for archaeological sites in the management plan under Alternative B and agree that they have the potential to benefit archaeological resources within park boundaries. However, we request the ability to review and comment upon specific activities undertaken in fulfillment of the management plan.

We appreciate the opportunity to be of service. If you have questions regarding our comments or the Section 106 process, please contact me or Ryan Burns, Historian, at (304) 558-0240.

Sincerely,

A handwritten signature in black ink, appearing to read "Lora A. Lamarre". The signature is fluid and cursive, with a large initial "L" and "A".

Lora A. Lamarre  
Senior Archaeologist

LAL/RCB

## **ATTACHMENT C**



## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

West Virginia Field Office  
694 Beverly Pike  
Elkins, West Virginia 26241

OCT 09 2001



United States Department of Interior  
National Park Service  
ATTN: Greg Jarvis  
Denver Service Center  
12795 W. Alameda Parkway  
P.O. Box 25287  
Denver, Colorado 80225-02087

Dear Mr. Hawkes:

This responds to your information request of July 30, 2001 regarding the potential impacts of a proposed project on federally listed endangered and threatened species. The National Park Service proposes to develop a climbing management plan for New River Gorge National River, in Fayette County, West Virginia. The planning area is focused on the gorge near the bridge at the town of Fayetteville.

There are numerous known hibernacula for the Indiana bat in the limestone region of eastern West Virginia in Preston, Tucker, Randolph, Pendleton, Pocahontas, Greenbrier, Monroe, and Mercer Counties. The population of the hibernacula in West Virginia range in size from one to 9,000 Indiana bats. Recent data indicate that the area within an approximate five-mile radius of a hibernaculum provides an important foraging and roosting habitat for the Indiana bat in the fall swarming period, August 15 through November 14. The project area is outside a five-mile radius of a known hibernaculum. Therefore, fall-swarming behavior is not expected in the proposed project area.

The U.S. Fish and Wildlife Service (Service) is also concerned with the possibility of direct take or habitat disturbance within a two-mile radius around known maternity roosts and capture sites. The project is not within a two-mile radius of a known capture site.

The Service has compared the number of acres of suitable summer foraging and roosting habitat on the West Virginia landscape available to each Indiana bat, versus the total acreage of forest. On that basis, we have determined that a small project, generally affecting 17 acres or less of

forest, will have an infinitesimally small chance (at the 98% confidence level) of resulting in direct or indirect take and is therefore discountable. The project would disturb less than 10 acres of potential forested Indiana bat summer roosting and foraging habitat.

Based on the facts that the proposed project is not located within a five-mile radius of a hibernaculum or a two-mile radius of a maternity roost or capture site, and that the project would affect less than 17 acres of forested habitat, the Service believes that the project is not likely to adversely affect the Indiana bat.

The Service also believes that the proposed project will not result in adverse effects to other federally listed species. Therefore, no Biological Assessment or further Section 7 consultation under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) is required with the Service regarding this project. Should the project plan change, or if additional information on listed and proposed species or species of concern becomes available, this determination may be reconsidered. A compilation of federally listed endangered and threatened species in West Virginia is enclosed for your information.

If you have any questions regarding this letter, please contact Mr. Shane Jones of my staff at (304) 636-6586, or at the letterhead address.

Sincerely,



Jeffrey K. Towner  
Field Supervisor

Enclosure





## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

West Virginia Field Office  
694 Beverly Pike  
Elkins, West Virginia 26241

MAY 16 2003



RECEIVED  
NATIONAL PARK  
SERVICE

MAY 19 2003

NEW RIVER GORGE  
NATIONAL RIVER

Mr. Calvin F. Hite, Superintendent  
New River Gorge National River  
Gauley River National Recreation Area  
Bluestone National Scenic Area  
National Park Service  
104 Main Street  
Post Office Box 246  
Glen Jean, West Virginia 25846

Dear Mr. Hite:

The U.S. Fish and Wildlife Service (Service) has reviewed your April 10, 2003 information request and April 22, 2003 fax regarding the presence of federally listed species and species of concern in the New River Gorge National River in Fayette, Raleigh, and Summers Counties, West Virginia; the Gauley National Recreation Area in Fayette and Nicholas Counties, West Virginia; and the Bluestone National Scenic River in Summers and Mercer Counties, West Virginia. The information will be used in the development of a Climbing Management Plan for the three management units.

The endangered Indiana bat, *Myotis sodalis*, may occur in all three areas. There are numerous known hibernacula for the Indiana bat in the limestone region of eastern West Virginia in Preston, Tucker, Randolph, Pendleton, Pocahontas, Greenbrier, Monroe, and Mercer Counties. The population of the hibernacula in West Virginia range in size from one to 9,000 Indiana bats. Recent data indicate that the area within an approximate five-mile radius of a hibernaculum provides an important foraging and roosting habitat for the Indiana bat in the fall swarming period, August 15 through November 14. The management areas are outside a five-mile radius of a known hibernaculum, however, a male Indiana bat was captured in September, 2002 near an abandoned mine portal in the New River Gorge National River management area.

The Service is also concerned with the possibility of direct take or habitat disturbance within a two-mile radius around known maternity roosts and capture sites. No Indiana bat maternity roosts are known in the management areas. However, as mentioned earlier a male Indiana bat was captured in the New River Gorge National River management area.

The Service has compared the number of acres of suitable summer foraging and roosting habitat on the West Virginia landscape available to each Indiana bat, versus the total acreage of forest. On that basis, we have determined that a small project outside of the five-mile radius of a hibernaculum and the two-mile radius of a capture site, generally affecting 17 acres or less of forest, will have an infinitesimally small chance (at the 98% confidence level) of resulting in direct or indirect take and is therefore discountable.

The endangered Virginia big-eared bat, Corynorhinus townsendii virginianus was discovered day roosting in abandoned mine shafts in the New River Gorge National River in 2002. To our knowledge, this is the first time that this species has been documented in this general part of West Virginia.

The threatened Virginia spiraea, Spiraea virginiana is a riparian shrub which occurs in the Bluestone and Gauley River National Recreation Areas. It is not known to occur in the New River Gorge National River. Numerous populations (clones) of Virginia spiraea occur along the Bluestone Gauley and Meadow Rivers. Virginia spiraea occurs along the rocky slopes and banks of these high energy streams. It is thought that the scouring flood flows reduces competition from other plants.

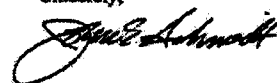
In addition to federally listed species the following species of concern (SOC) may occur on the management areas. SOC's are those for which the Service has information indicating that protection under the Endangered Species Act may be warranted, but for which it lacks sufficient information on status and threats to proceed with preparation of a proposed listing. On December 5, 1996 the Service announced their final decision to discontinue efforts to maintain a national list of these species. While species of concern lack formal recognition as candidates for possible future listing under the Endangered Species Act, the Service and the West Virginia Division of Natural Resources encourage continued consideration of these species in environmental planning.

Eastern woodrat, Neotoma floridana magister  
Southeastern big-eared bat, Plecotus rafinesquii  
Small-footed myotis, Myotis liebigi  
Cerulean warbler, Dendroica cerulea  
Candy darter, Etheostoma osburni  
Kanawha minnow, Phenacobius teretulus  
Hellbender, Cryptobranchus alleganiensis  
Sidelong supercoil, Paravittia ceras  
Elktoe mussel, Alasmidonta marginata  
Diana fritillary butterfly, Speyeria diana  
Barbara's buttons, Marshallia grandiflora  
Horse-mint, Monarda fistulosa var. virginica  
Butternut, Juglans cinerea

Although it is unlikely that the Indiana bat and the Virginia big-eared bat would be adversely affected by sport climbing, the southeastern big-eared bat and the small-footed myotis could be subject to disturbance due to their habitat of roosting in cracks in the cliff face.

If you have any questions regarding these comments, please have your staff contact me directly, at (304)-636-6586 or at the letterhead address.

Sincerely,

  
for William A. Tolin  
Acting Field Supervisor

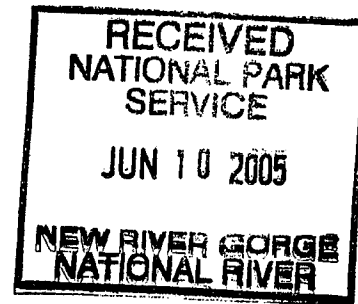


# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

West Virginia Field Office  
694 Beverly Pike  
Elkins, West Virginia 26241

June 8, 2005



Mr. Calvin F. Hite, Superintendent  
New River Gorge National River  
104 Main Street  
Post Office Box 246  
Glen Jean, West Virginia 25846

Re: Environmental Assessment: Climbing Management Plan.

Dear Mr. Hite:

The Service has reviewed the Environmental Assessment for the Climbing Management Plan for the National Park Service (NPS) New River Gorge National River located in Raleigh, Fayette, and Summers Counties, West Virginia. These comments are provided pursuant to the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) and the National Environmental Policy Act of 1969 (42 U.S.C. 4231 et seq.).

The NPS proposes to implement a climbing management plan that would incorporate a variety of approaches and tools to manage climbing, including education and outreach efforts, improvements to facilities, and the use of new and existing trails. Alternative B, the preferred alternative, would incorporate expanded monitoring of natural resources, including federal listed species and species of concern. The plan also includes enhanced monitoring of peregrine falcon activities in the area, and site closures in the event that courtship behavior is observed. The Service concurs with selection of the NPS's preferred alternative. As proposed, implementation of the climbing management plan should not adversely affect threatened or endangered species, and in some cases the proposed management may result in beneficial effects to these species. Should project plans change, or if additional information on listed and proposed species becomes available, this determination may be reconsidered.

If you have any questions regarding this letter, please contact Ms. Barbara Douglas of my staff at (304) 636-6586, or at the letterhead address.

Sincerely,

Thomas R. Chapman  
Field Supervisor